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Attorneys for Plaintiffs.

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

WILLIAM A. NIESE, et al.,

Plaintiffs,

vs.

CHANDLER TRUST NO. 1, et al.,

Defendants.

No. CV 11-7577 PSG

**NOTICE OF FILING OF (I)
INTERESTED PARTY RESPONSE
AND (II) NOTICE OF RELATED
ACTION IN PENDING MDL NO. 2296**

PLEASE TAKE NOTICE, that Teitelbaum & Baskin, LLP, as attorneys for Plaintiffs, 187 retirees of The Times Mirror Company, the Tribune Company ("**Tribune**") and/or one or more of 110 affiliates or subsidiaries of the Tribune Company ("**Tribune Entities**" or "**Debtors**") (the "**Plaintiffs**"), have filed both a **Notice of Related Action** (the "**Notice**") and an **Interested Party Response to Motion to Transfer Related Actions For Consolidated Pretrial Proceedings Pursuant to 28 U.S.C. §1407** (the "**Response**") before the United States Judicial Panel on Multidistrict Litigation in the pending matter known as *In re Tribune Fraudulent Conveyance Litigation* (MDL No. 2296), relating to the motion by Deutsche Bank Trust Company Americas, in its capacity as successor indenture trustee for a certain series of Senior Notes ("**DBTCA**"), Law Debenture Trust Company of New York, in its capacity as successor indenture trustee for a certain series of Senior Notes ("**Law Debenture**"), and

Wilmington Trust Company, in its capacity as successor indenture trustee for PHONES Notes ("**Wilmington Trust**" and, together with DBTCA and Law Debenture, the "**Noteholders**") for an order transferring various actions by the Noteholders (the "**Noteholder Actions**") to the Southern District of New York for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. §1407 (the "**MDL Motion**"). (A copy of Plaintiffs' Notice and Response filed in the MDL Action are attached hereto as Exhibits A and B, respectively).

As set forth in the Notice and Response, the Plaintiffs agree that: (1) the Noteholder Actions satisfy the statutory requisites for transfer and consolidation (*i.e.*, one or more common questions of fact under 28 U.S.C. §1407 and that transfer and consolidation will promote judicial economy, avoid conflicting and duplicative motions, discovery and rulings, and will reduce the burden and cost of litigation for all parties); (2) that the same factors alleged in the MDL Motion support consolidating the four state law constructive fraud actions commenced by the Plaintiffs with the Noteholder Actions; and (3) transfer of venue of all such actions to an MDL Panel in the United States District Court for the Southern District of New York is in the best interest of the parties and justice. The four state law constructive fraud actions commenced by the Plaintiffs (collectively, the "**Retirees Actions**") are:

a. the instant action, *William A. Niese et al. vs. Chandler Trust No. 1 et al.* – Case No. 11-CV-7577-PSG (originally filed in California Superior Court, Los Angeles County and subsequently removed to the United States District Court for the Central District of California) (the "**California Action**");

b. *William A. Niese et al. v. ABN AMRO Clearing Chicago LLC. et al.* – Case No. 11-CV-05155-JHL (originally filed in Illinois Circuit Court of Cook County and subsequently removed to the United States District Court for the Northern District of Illinois) (the "**Illinois Action**");

c. *William A. Niese et al. vs. AllianceBernstein, L.P. et al.* – Case No. 11-CV-4538-RJH (originally filed in New York State Supreme Court, New York County and

1 subsequently removed to the United States District Court for the Southern District of
2 New York) (the “**New York Action**”); and

3 d. *William A. Niese et al. vs. A.G. Edwards Inc. et al.* – Case No. 11-CV-
4 00583-GMS (originally filed in Delaware Superior Court, New Castle County and
5 subsequently removed to United States District Court for the District of Delaware) (the
6 “**Delaware Action**”).

7 Accordingly, in the Response, the Plaintiffs: (a) concur with the Noteholders'
8 analysis as to the propriety of transferring the Noteholder Actions to the Southern
9 District of New York for consolidated pretrial proceedings; and (b) seek an order
10 authorizing transfer of the Retiree Actions to the Southern District of New York for
11 coordinated and consolidated pretrial proceedings with the Noteholder Actions and each
12 such other cause of action the United States Judicial Panel on Multidistrict Litigation
13 deems appropriate for coordination and consolidation.

14 Dated: September 23, 2011

JUDD LAW GROUP

16 By: /s/ Jeffrey M. Judd
17 Jeffrey M. Judd

18 TEITELBAUM & BASKIN, LLP

19 ATTORNEYS FOR PLAINTIFFS
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